

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS; aphillips@asphaltroofing.org
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Aaron R. Phillips
Date: Wednesday, May 3, 2023 1:11:07 PM

Commenter Contact Information

Name: Aaron R. Phillips

Date: 5/3/2023 12:00:00 AM

Representing: Asphalt Roofing Manufacturers Association (ARMA) Mailing Address Number and

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Proposed Building Standard

Title 24 Part #: Part 2

Section #: Chapter 15, Section 1505.5

Proposing State Agency: State Fire Marshall This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):

Approve as Amended

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

SFM 02/22, ITEM 11-1.

Section 1505.5 Nonclassified roofing.

ARMA recommends changing section 1505.5 to state, "Nonclassified roofing is approved material that is not listed as a Class A, B or C roof assembly or roof covering." Both "roof assembly" and "roof covering" are defined terms. However, "roof covering assembly," which is included in the proposed language, is not defined. Correction of the terminology as recommended will improve clarity of this section. The CAC recommendation to make this change is acknowledged in the ISOR.

This recommendation is based on Health and Safety Code Section 18930(a)(6), with an intent to reduce ambiguous and vague language in the proposal.

9 Point Criteria Info:

18930(a) 6